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Attorneys for Plaintiff
Western World Insurance Company

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

WESTERN WORLD INSURANCE COMPANY.

Plaintiff,

v.

PROFESSIONAL COLLECTION CONSULTANTS.

Defendant.

CASE NO. 2:15-cv-02342 MWF (VBKx)

**DECLARATION OF SARA M.
PARKER IN SUPPORT OF
WESTERN WORLD INSURANCE
COMPANY'S MOTION FOR
PARTIAL SUMMARY JUDGMENT
RE: QUANTIFICATION OF
DAMAGES**

Date: July 2, 2018
Time: 10:00 a.m.
Courtroom: 5A
Judge: Hon. Michael W. Fitzgerald

Complaint Filed: 3/30/15

J. Sara M. Parker, declare.

1. I am an attorney licensed to practice before all courts in the State of California and the United States District Court for the Central District of California, and am a partner with the law firm of Selvin Wraith Halman LLP, counsel of record for Plaintiff Western World Insurance Company (“Western World”). The following is based on my personal knowledge and if called as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of Western World Insurance Company's ("WWIC") August 7, 2014, reservation of rights letter in the *Hudson* matter.

3. Attached hereto as **Exhibit B** is a true and correct copy of WWIC's January 9, 2015, supplemental reservation of rights letter in the *Hudson* matter.

4. Attached hereto as **Exhibit C** is a true and correct copy of WWIC's January 20, 2015, supplemental reservation of rights letter in the *Hudson* matter and reservation of rights in the *Pole* and *McCann* matters.

5. Attached hereto as **Exhibit D** is a true and correct copy of Clark Garen's March 17, 2015, request to take over the defense of PCC.

6. Attached hereto as **Exhibit E** is a true and correct copy of WWIC's June 3, 2015, letter declining to relinquish the defense of PCC to Clark Garen.

7. Attached hereto as **Exhibit F** is a true and correct copy of the Excel spreadsheets calculating WWIC's defense fees, costs, and indemnity payments and 10% prejudgment interest calculations. WWIC will provide the "active" electronic spreadsheets with all formulas upon requests.

8. Attached hereto as **Exhibit G** is a true and correct copy of fee and cost documentation provided by WWIC to PCC. PCC does not dispute WWIC's indemnity payment of \$150,000 for PCC.

9. Attached hereto as **Exhibit H** is a true and correct copy of the Declarations Pages of WWIC Policy Number BRL8000034, effective 02/17/14 – 02/17/15.

10. Attached hereto as **Exhibit I** is a true and correct copy of multiple written meet and confer communications between WWIC's counsel and PCC's counsel regarding amount paid by WWIC for PCC in the underlying actions and prejudgment interest.

11. Attached hereto as **Exhibit J** is a true and correct copy of the parties April 24, 2018, May 23, 2018 and May 29, 2019 meet and confer correspondence regarding

1 this motion.

2 I declare under penalty of perjury under the laws of the United States of
3 America that the foregoing is true and correct. Executed this 30th day of May, 2018, at
4 Oakland, California.

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6 By: /s/ Sara M. Parker
7 Sara M. Parker
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